IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No. 15 CR 399-1
)	Hon. Manish S. Shah
VINCE MANGLARDI)	

<u>DEFENDANT'S MOTION TO RE-SET BRIEFING SCHEDULE AND SENTENCING DATE</u>

NOW COMES the Defendant, VINCE MANGLARDI, by and through his attorney, RALPH MECZYK, and respectfully moves this Honorable Court, to delay the final completion of the PSR and to re-set Defendant's sentencing hearing to a date in February 2019. In support, Defendant states as follows:

- Defendant pled guilty pursuant to a written plea agreement. R.
 He is currently scheduled to be sentenced on December 11, 2019.
- 2.) Defendant has very serious throat cancer. Undersigned counsel is still in the process of collecting all of the necessary medical records to make its case in mitigation at sentencing. Undersigned counsel has requested, but is still waiting for, the majority of the medical records from Defendant's treating physician.
- 3.) Defendant would like these records to be part of the PSR so that the Court has a full picture of Defendant's health at the time of sentencing. As such, Defendant asks for a continuance until sometime in February 2019.

Respectfully submitted:

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CERTIFICATE OF SERVICE

Ralph. E. Meczyk, Attorney at Law, hereby certifies that the foregoing Motion was served on October 9, 2018, in accordance with Fed.R.Crim.P.49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

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